

October 14, 2014

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Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Petition of Neustar, Inc. on Behalf of the South Carolina
Telecommunications Industry for Approval of NPA Relief
Plan for the 843 NPA
Docket No. 2013-207-C

Dear Ms. Boyd:

I am writing on behalf of Farmers Telephone Cooperative, Inc. ("Farmers") and FTC Diversified Services, LLC ("FTC-D") (collectively referred to herein as "FTC") to notify the Public Service Commission of South Carolina ("Commission") regarding FTC's plan to implement 10-digit dialing for FTC customers in the 803 area code at the same time it implements 10-digit dialing for its customers in the 843 area code.

Farmers' incumbent local exchange telephone service area in South Carolina is roughly evenly split between the 803 area code and the 843 area code. FTC-D provides competitive local exchange service primarily in those areas where Frontier Communications of the Carolinas, Inc. is the incumbent local exchange carrier and that are wholly located within or are contiguous to Farmers' service area.

As a result of the overlay of the new 854 area code over the existing 843 area code that will occur in October 2015, it will be necessary for all carriers operating in the 843 area code to implement mandatory 10-digit dialing within the 843 area code. Because FTC's service area is roughly evenly split between the 803 area code and the 843 area code, FTC believes that implementing 10-digit dialing throughout its service area at one time is efficient and will cause less confusion among FTC's customers than would implementing such dialing changes in a piece-meal fashion.

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Not only would it cause less customer confusion, but it would also serve the public interest by allowing FTC to implement such dialing in an administratively efficient and convenient manner. FTC's implementation in the 803 area code would track the schedule for implementing 10-digit dialing in the 843 area code in this docket. According to the Proposed Customer Education Plan filed by the industry group in this docket, the first Customer Notification regarding 10-digit dialing will be sent on or before February 14, 2015, and permissive 10-digit dialing will begin on March 14, 2015. Final customer notification will be sent on or before August 19, 2015, and mandatory dialing will begin on September 19, 2015. FTC plans to follow this same schedule in the 803 area code, except that FTC may extend the permissive dialing period in the 803 area code if it would be in the best interest of FTC's customers.¹

FTC's implementation of 10-digit dialing in the 803 area code will impact FTC customers only, and will have no impact on the dialing patterns of customers of any other voice service provider. FTC will provide appropriate notice of the dialing changes to its customers in the 803 area code, at the same time it provides notice of the dialing changes to its customers in the 843 area code.


Following implementation of 10-digit dialing, FTC's customers will continue to be prompted to "dial 1" before they can complete a toll call, just as they are today. In this manner, customers will be able to determine whether or not they will incur a toll charge when making a 10-digit-dialed call.

We have discussed this matter with both the Office of Regulatory Staff and the North American Numbering Plan Administration ("NANPA"), and they do not have any concerns with FTC proceeding to implement 10-digit dialing in the 803 area code at this time. If the Commission has any questions about this proposal, please let us know as soon as possible and not later than October 30, 2014, so that FTC may prepare to implement 10-digit dialing throughout its service area in a seamless manner.

Thank you for your assistance.

Sincerely,

McNAIR LAW FIRM, P.A.



Margaret M. Fox

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cc: Jeffrey L. Lawrimore
Parties of record

¹ In other words, since there will not be an area code overlay in the 803 area code, there is not the same urgency to make 10-digit dialing mandatory by September 19, 2015. FTC will continue permissive dialing on a 10-digit basis until it is satisfied that its customers have become accustomed to the new dialing arrangement.

BEFORE
THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

DOCKET NO. 2013- 207 - C

In the Matter of the Petition of Neustar,)
Inc. on Behalf of the South Carolina)
Telecommunications Industry, For Approval of)
NPA Relief Plan for the 843 NPA)
_____)

CERTIFICATE OF SERVICE

I, Heather M. Elder, do hereby certify that I have this date served one (1) copy of the S. C. Telephone Coalition's Petition to Intervene in the above-referenced docket upon the following parties causing said copies to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows:

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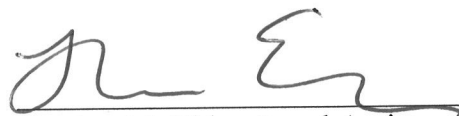
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